

Attachment A.6. Assessment of Program Effectiveness

VI. Summary of Program Effectiveness

- A. Attach a summary of the effectiveness of your stormwater management program. This summary should include, at a minimum, the following:
 - 1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
 - 2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your stormwater management program;
 - 3. A summary of the strengths and weaknesses of your agency's stormwater management program;
 - 4. A list of specific program highlights and accomplishments;
 - 5. A description of water quality improvements or degradation in your watershed over the past fiscal year;
 - 6. Interagency coordination between cities to improve the storm water management program;
 - 7. Future plans to improve your agency's storm water management program; and
 - 8. Suggestions to improve the effectiveness of your program or the County model programs.
- B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.
- C. List any suggestions your agency has for improving program reporting and assessment.

A. Assessment of Program Effectiveness

1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;

As provided in the City's responses to the questions in the Individual Annual Report form, the City of Hidden Hills (City) is in compliance with applicable Permit requirements of the Los Angeles Countywide Municipal NPDES Permit (Order 01-182).

2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;

The City uses several methods to evaluate compliance with the Los Angeles MS4 Permit and state water quality requirements. Evaluation methods used by the City to assess program effectiveness include the following:

- Completion and evaluation of the annual report forms;
- Assessment of community response to new stormwater requirements;
- Review of applicable studies and reports issued by entities such as the County, environmental groups and the Regional Board; and
- Periodical physical and administrative review of program implementation.

Additionally, the City maintains ongoing relationships with other local, state, and regional agencies and welcomes any comments regarding stormwater or regulatory compliance suggestions, comments, or advice.

2. A summary of the strengths and weaknesses of your agency's storm water management program;

The following are the City's identified strengths and weaknesses of the City's stormwater management program:

Program Strengths

- As a small-size city where developed area consists almost entirely of low-density, single-family residential use, the City has relatively few stormwater pollutant sources. Of particular note, there are no industrial or commercial developments in the City; therefore there is little potential for stormwater pollution from industrial or commercial sources. Therefore, any identified sources of pollutants can be readily identified, addressed, or prevented.

- The City actively participates in a variety of storm water quality management program activities that help guide improvements to the City's Stormwater Management Program. City staff is dedicated to an ongoing effort to develop and improve upon current program activities.
- Although not currently required, the City has an aggressive street sweeping program to control trash and other potential pollutant discharge. All streets are swept at least on a monthly basis. Major streets – Long Valley Road, Round Meadow Road, and Jed Smith Road – are swept on a weekly basis. This weekly sweeping frequency for the major streets represents a sweeping level that is twice that which is required for Priority A streets under the Permit (i.e., the Permit requires Priority A streets to be swept on a biweekly basis).
- The Hidden Hills Community Association (HHCA) is active in City efforts to control pollution. Their staff regularly conducts manual litter collection from City streets and HHCA rights-of-way, as well as funding additional street sweeping activities. As a result of the City's and HHCA's effort, there is very little observable litter, trash, or debris on municipal and HHCA owned property.
- All appropriate City and HHCA staff continues to receive annual training on program implementation, including training in addition to the minimum required training under the current Permit. The City and HHCA take special interest in existing and upcoming stormwater and water quality regulatory initiatives.

Program Weaknesses

- The only identifiable stormwater program weakness is the financial constraints of the City and competition of resources for other City programs. With ever increasing stormwater and state water quality mandates, the storm water quality management program draws significant resources away from other important City services such as police, fire, and public works.
- Stormwater regulatory requirements imposed on the City have been, and continue to be unfunded State mandates that are expanding at a rapid rate. The costs and logistics of program implementation are increasingly more challenging. This is especially true for a city such as Hidden Hills. Hidden Hills is a small bedroom community with no industrial/commercial business tax base and a small City staff. The City lacks the scale revenue base and organizational funding that some of the larger cities may have access to.
- New regulations recently issued in the form of Total Maximum Daily Loads (TMDLs) are high-cost mandates for the City's limited financial resources. The various TMDL requirements impact the City more because the City is regulated under two separate sets of TMDL requirements: (1) TMDLs for the Los Angeles River Watershed to which the City primarily drains; and (2) TMDLs for the Malibu Creek Watershed (MCWS). The City's overall TMDL compliance efforts are effectively doubled.

3. A list of specific program highlights and accomplishments;

Several of the City's most notable highlights and accomplishments include:

- Stormwater Organization Meetings - City staff continues to attend numerous watershed and sub-watershed advisory meetings. Such meetings include the Los Angeles Executive Advisory Committee (LA EAC) meetings, the Los Angeles River Watershed Management Committee meetings, and the Malibu Creek Watershed Management Committee meetings. City staff also attends all special meetings of these groups in discussion of NPDES related issues and developments. Where necessary, staff also attends and participates in regulatory oversight, development, and implementation meetings held by the State and Regional Water Quality Control Boards. Such meetings include Basin Plan Amendment workshops, regulatory scoping meetings, public hearings and meetings, and formal Regional Board hearings.
- Malibu Creek Watershed (MCWS) Activities – City staff actively participated in all MCWS Watershed Management Committee (WMC) meetings including the MCWS Bacteria TMDL strategy meetings (e.g., meetings on the Santa Monica Bay Beaches Bacteria TMDL). As such, the City is co-funding the various studies of the Malibu Creek watershed.
- Los Angeles River Watershed (LARWS) Activities – The City participated in all Watershed Management Committee (WMC) meetings. The City has provided staff to assist the LA River Management Committee in the development of the Coordinated Monitoring Plan for Metals.
- Annual Program Training – The City continues to provide a comprehensive training program for City staff and Hidden Hills Community Association personnel.
- Development and Publishing of Public Outreach Materials – The City prepared and published public service announcements (PSAs) and articles in support of stormwater programs in the City newsletter. These included PSAs on the control of litter and dog waste, swimming pool/spa maintenance, and best management practices for dry weather flows to storm drain systems.
- Countywide Media Campaign – The City continues to contribute funding in support of the County's stormwater media campaign. The

City believes this method of co-permittee cooperation increases overall public awareness.

4. A description of water quality improvements or degradation in your watershed over the past fiscal year;

The City is not aware of any water quality degradations and believes that improvements in the watershed actually occurred over the past reporting period. The City supports the State's antidegradation policy and seeks to implement efforts to improve local, regional, and state water quality.

5. Interagency coordination between cities to improve the storm water management program;

As provided above, the City attends most, if not all, local, regional, and relevant state organization meetings applicable to stormwater and water quality. These meetings provided an excellent opportunity for the City to coordinate with local and regional cities in the watershed to further the improvement of the City's storm water management program.

6. Future plans to improve your agency's storm water management program; and

The City continues to look for methods to update training materials and public education and outreach materials to help improve existing programs.

7. Suggestions to improve the effectiveness of your program or the County model programs.

The City does not have comments to improve its or the County's program effectiveness.

B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.

The City of Hidden Hills rates its level of compliance with Order No. 01-182, at level 10 – full implementation of all permit requirements.

C. List any suggestions your agency has for improving program reporting and assessment.

The City has no further suggestions for improving program reporting and assessment at this time.